

1-24-0437

FILED  
2/28/2024 11:53 PM  
Lisa Y. Martinez  
CIRCUIT CLERK  
COOK COUNTY, IL  
2024COEL000013

APPEAL TO THE APPELLATE COURT OF ILLINOIS FOR THE FIRST DISTRICT  
FROM THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, COUNTY DIVISION

STEVEN DANIEL ANDERSON, CHARLES J. )  
HOLLEY, JACK L. HICKMAN, RALPH E. )  
CINTRON, and DARRYL P. BAKER, )

Petitioners, )

v. )

DONALD J. TRUMP, the ILLINOIS STATE )  
BOARD OF ELECTIONS sitting as the State )  
Officers Electoral Board, and its Members )  
CASSANDRA B. WATSON, LAURA K. )  
DONAHUE, JENNIFER M. BALLARD CROFT, )  
CRISTINA D. CRAY, TONYA L. GENOVESE )  
CATHERINE S. MCCRORY, RICK S. )  
TERVIN, SR., and JACK VRETT, )

Respondents. )

Case No. 2024 COEL 13

Hon. Tracie R. Porter

Calendar 9

E-FILED  
Transaction ID: 1-24-0437  
File Date: 2/29/2024 9:34 AM  
Thomas D. Palella  
Clerk of the Appellate Court  
APPELLATE COURT 1ST DISTRICT

**NOTICE OF APPEAL**

Pursuant to Illinois Supreme Court Rule 303, Respondent-Appellant Donald J. Trump hereby appeals to the Appellate Court of Illinois for the First District from the Circuit Court’s February 28, 2024 Memorandum of Judgment and Order (the “Judgment”), which reversed the January 30, 2024 decision of the Illinois State Board of Elections, sitting as the duly constituted State Officers Electoral Board (the “Electoral Board Decision”) and ordered the Illinois State Board of Elections to remove Respondent-Appellant Donald J. Trump “from the ballot for the General Primary Election on March 19, 2024, or cause any votes cast for him to be suppressed.”

By this appeal, Respondent-Appellant respectfully requests that the Appellate Court: (a) reverse and vacate the Judgment; (b) affirm and reinstate the Election Board Decision, which overruled and dismissed Petitioners-Appellees' January 4, 2024 objection to the nomination papers of Donald J. Trump, Republican Party primary candidate for the office of President of the United States; (c) stay the effect of the Judgment pending resolution of this appeal; and (d) grant such other relief as the Appellate Court deems just and proper.

Dated: February 28, 2024

Respectfully submitted,

RESPONDENT-APPELLANT DONALD J. TRUMP

By: /s/ Adam P. Merrill  
One of his attorneys

Scott E. Gessler  
GESSLER BLUE LLC  
7350 E. Progress Place, Ste. 100  
Greenwood Village, CO 80111  
720-839-6637  
[sgessler@gesslerblue.com](mailto:sgessler@gesslerblue.com)

Adam P. Merrill (6229850)  
WATERSHED LAW LLC (No. 64892)  
55 W. Monroe, Suite 3200  
Chicago, Illinois 60603  
312.368.5932  
[AMerrill@Watershed-Law.com](mailto:AMerrill@Watershed-Law.com)

Nicholas J. Nelson (pro hac vice)  
CROSS CASTLE PLLC  
333 Washington Ave. N.,  
STE 300-9078  
Minneapolis, MN 55401  
612.429.8100  
[nicholas.nelson@crosscastle.com](mailto:nicholas.nelson@crosscastle.com)

**CERTIFICATE OF SERVICE**

I, Adam P. Merrill, hereby certify that on February 28, 2024, I caused a true and correct copy of the foregoing **NOTICE OF APPEAL** to be served upon all parties/ counsel of record via the Court's Electronic Filing System.

Under penalties as provided by law pursuant to section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this certificate of service are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Adam P. Merrill

Adam P. Merrill